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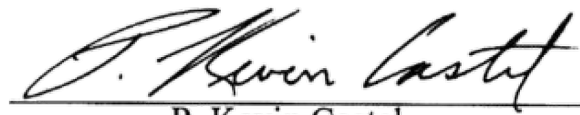
Sentencing is adjourned from May 2, 2024 to July 2, 2024
at 2:00 p.m. in Courtroom 11D.

SO ORDERED.

Dated: 3/27/2024

Via ECF and E-Mail

Honorable P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



P. Kevin Castel
United States District Judge

Re: *United States v. Mauricio Hernandez Pineda*
15 Cr. 379 (PKC)

Dear Judge Castel:

Together with Ken Womble, Esq., and Cory Garcia, Esq., I am counsel to Mr. Mauricio Hernandez-Pineda in the above-referenced matter, appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. This correspondence is to request an extension of time for the defense’s Sentencing Memorandum and an adjournment of the sentence date.

On February 2, 2024, Mr. Pineda entered a plea of guilty before Magistrate Judge Robert W. Lehbarger. A Pre-Sentence Investigation by the United States Department of Probation for the Southern District of New York (“Probation”) was ordered and the matter was scheduled for sentencing before Your Honor on May 2, 2024.

Mr. Pineda was interviewed by Probation in connection with the preparation of the Pre-Sentence Investigation Report (“PSR”) on February 28, 2024, and as of the date of this correspondence, we have not yet received Probation’s PSR. Additionally, we have unearthed a number of matters pertinent to Mr. Pineda’s history and characteristics for presentation to the Court at sentencing. We therefore require additional time to: thoroughly investigate these issues; review the PSR First Disclosure and PSR with Mr. Pineda; and prepare our Sentencing Memorandum.

As such, we respectfully request that the Court grant a 6-week extension, until the week of June 17, 2024, so that we may conduct the necessary investigation and prepare our Sentencing Memorandum for submission. We have made no previous requests for extensions of time. Based upon our communications with A.U.S.A. David Robles, the government has no objection to this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc via email: A.U.S.A. David Robles